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# INTERNATIONAL PACIFIC HALIBUT COMMISSION

ESTABLISHED BY A CONVENTION BETWEEN CANADA

AND THE UNITED STATES OF AMERICA

March 3, 1999

RECEIVED  
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N.P.F.M.C.

Dr. Clarence Pautzke, Executive Director  
North Pacific Fishery Management Council  
605 W 4<sup>th</sup> Ave., Suite 306  
Anchorage AK 99501-2252

Dear Clarence:

At the Commission's Annual Meeting in Prince Rupert a number of items of concern to the Council were discussed and the Commission wishes to bring the following to the Council's attention:

1. **Letter and resolution from the Southeast Alaska Federal Subsistence Regional Advisory Council.** This letter supports the use of Local Area Management Plans for the protection and enhancement of local halibut resources. The Commission responded that actions concerning local area management are under the jurisdiction of the Council and we are passing this letter to you. The Commission will, as it has for other groups involved in such developments, provide both commercial catch (at the resolution of statistical area) and research data to this group for use in this process. As a matter of policy, the Commission supports measures designed to manage halibut most effectively among user groups (see also point 5, below).
2. **Chukchi Sea experimental fishery.** In 1998, the Commission approved an experimental halibut fishing quota of 20,000 lbs total for the exploration of fishing opportunities in the Chukchi Sea by two groups, the Bering Sea Fisherman's Association and the Norton Sound Economic Development Corporation. The Alaska Department of Fish and Game coordinated a sharing arrangement for the quota by the two groups. For a number of logistical reasons, neither group was able to generate the target programs during 1998 and the Commission has re-authorized the experimental 20,000-lb quota for 1999. Both groups are required to report the results of their investigations to the Commission's Annual Meeting in January 2000.

3. **Retention of sublegal halibut for personal use in Area 4E CDQ fisheries.** In 1998, the Commission approved the retention of halibut less than legal size for the CDQ fisheries in Area 4E, for a two-year trial period. The Commission recognizes that the evaluation of this program at the end of 1999 will require information and also received a request from the National Marine Fisheries Service for specific regulations concerning reporting of undersized halibut retention. The Commission has therefore approved a regulation for 1999 requiring the manager of any CDQ organization that authorizes halibut harvest in Area 4E to provide accounting of the number and weight of undersized halibut taken and retained in these fisheries. The report must also include details of the methodology used for collection of such data.
4. **Taking of Area 4D CDQ halibut in Area 4E.** The Commission's Conference Board received a request from the CDQ corporations on the Bering Sea mainland to allow CDQ halibut allocations presently identified for Area 4D, to be fished in Area 4E. The Conference Board concurred with this request. The Commission has no objection to this request because it assesses the halibut in Areas 4C, 4D, and 4E as a single unit. As such, the removal data from the three areas are combined in the assessment. We note that there may be administrative issues for the Council to consider and forward this request for your consideration. However, the Commission does stipulate that the correct area of capture for halibut must be identified on landing and reporting records, i.e., if Area 4D CDQ fish is harvested in Area 4E then it must be identified as to the correct area of origin on all sales slips and logbook records.
5. **Letter from the North Pacific Fishery Management Council to the Commission.** Your letter of October 19, 1998 raised three issues.
  - a) Collection of halibut landings data by ADF&G statistical area to facilitate local area management. The Commission will continue to supply halibut landings data by ADF&G statistical area to interested parties for the purpose of developing local area management plans. These data are available for commercial halibut landings by all vessel sizes and are taken directly from ADF&G sales slips.
  - b) Retention of undersized halibut in Area 4E CDQ fisheries. See point 3 above.
  - c) Participation of IPHC staff in meetings of IFQ Implementation Committee and the Enforcement Committee concerning compliance with IFQ regulations and potential need for a weighmaster program. Commission staff will continue to participate in these meetings. The Commission expresses its concern that the target level of enforcement presence for IFQ monitoring is not being achieved by NMFS Enforcement Division. The Commission also requests that the Council lend its support to any initiatives that will result in increased monitoring of IFQ compliance.
6. **Halibut bycatch mortality.** The Commission remains concerned that the target reductions in bycatch mortality, agreed upon by the United States in 1991, have not been achieved. While the IPHC acknowledges and values the reductions in mortality that have occurred, we note limited progress on such elements as individual incentive programs and reduced PSC limits, during a time when Canadian bycatch mortality has been decreased substantially using such tools. Notwithstanding the differences in the target fisheries, such tools are clearly an effective means to reduce bycatch

mortality. The Commission requests the Council's evaluation of bycatch reduction measures undertaken, progress on the 1991 agreement, and the timetable for achieving the 1991 targets.

7. **Live fish landings.** The Commission conducted detailed discussion concerning the landing of live fish, penning of fish for subsequent sale, or penning for the purpose of aquaculture. Limited penning of live halibut for subsequent sale was permitted in Canada in 1998 because the Canadian Department of Fisheries and Oceans' regulations have not mirrored the IPHC regulation requiring all fish to be eviscerated on unloading from the vessel. The Commission reviewed the issue and will continue to study it over the next year but made no changes in the IPHC regulation for 1999. The Commission will note to the Government of Canada that this IPHC regulation is not mirrored in the present regulations of the Canadian Department of Fisheries and Oceans.
8. **Working group on season length.** The Commission received several submissions concerning altering the season length or eliminating the winter closure entirely. The Commission staff will convene a working group of staff from agencies, to address the biological, data, regulatory, and administrative issues that would have to be accommodated if the halibut season length were to be changed. The working group will provide a report to the Commission prior to its next annual meeting. The Commission solicits Council staff participation on that working group.
9. **Joint meeting of the IPHC and NPFMC.** The Commission has found the joint meetings with the Council to be most valuable. We would like to continue this process and request a similar meeting with the Council during 1999. In particular, the Commission would like the opportunity to review progress on bycatch mortality reduction, compliance issues, the fee collection program under MSFCMA, as well as other items of mutual interest.

Sincerely,



Bruce M. Leaman  
Executive Director

cc: IPHC Commissioners